

I wish to comment on the proposal to immediately require the replacement of all aircraft ELT's with 406 MHZ units by Apr 1.

While I understand that the 406 MHz units offer some theoretical advantages, their differences from the older 121.5 MHz units for all users is not as great as it may appear. For those of us who nearly always fly in contact with the ATC when on any flight away from the local airfield, the position of the aircraft is always known very accurately should there be a problem.

Additionally, in the practical world, with today's technology, the ELT is no longer the primary rescue device. With ADS-B coming as a requirement in only 7 years, that will provide exact last known position of any aircraft and not depend on any form of activation or battery life. Further, any survivor is much more likely to use a cell phone or hand held radio as the primary tool to contact help.

Having the aviation community spend \$300 million instead of using that money to accelerate the conversion to ADS-B is counter productive. There is a limited "pot" from which funds are drawn. Forcing this expenditure simply takes away from a more productive expenditure on ADS-B or other more effective measures.